NON-CUSTODIAL ESI SOURCE INFORMATION

May 15, 2020 Discovery Conference

	General Non-Custodial ESI Information Requested:
1.	Description of relevant ESI systems
2.	Description of location of those systems
3.	Description of how ESI is stored
4.	Description of how ESI will be searched/retrieved or has been searched/retrieved from the applicable systems (including identification of an ESI liaison (ideally, a data scientist) who can explain how data is accessed)
5.	To the extent Facebook claims ESI is too burdensome to collect and/or produce, clear articulation of the burden so the parties can reach efficient solutions to address these burdens
	Specific Information Regarding the Following Systems:
1.	All ESI sources storing client content, information, data and profiles throughout the Class Period, including but not limited to the Hive
2.	As to the Hive, specific information from ESI liaison regarding whether it is possible to run a SQL database "show tables" command to get a listing of tables. Or, if more appropriate, give access to Plaintiffs' experts to query the Hive directly.
3.	All ESI sources which contain information about users' experience, including how users are introduced to terms of service and the data policy; how user experience was studied; how it was constructed and why; identification as to if these are in Enterprise/departmental document centers.
4.	All ESI sources which contain privacy audits and steps taken to safeguard user data.
5.	All ESI sources which store data about Facebook users obtained from sources other than the platform, such as data brokers, and how that data was curated and matched to data from Facebook user activity.
6.	All ESI Sources which contain information about how Facebook monetizes access to user data.